

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

UNITED STATES OF AMERICA,)	CASE NO. 5:17-CR-00527
)	
Plaintiff,)	JUDGE CHRISTOPHER A. BOYKO
)	
VS.)	MOTION TO CONTINUE PRETRIAL
)	TRIAL AND TO EXTEND ALL DATES
LETROY VAUGHN,)	
)	CERTIFICATE OF SERVICE
Defendant,)	

Now comes Defendant, Letroy Vaughn, by and through counsel, Samuel G. Amendolara, hereby respectfully moves this Honorable Court to issue an Order continuing the Final pretrial currently scheduled on Tuesday, February 18, 2020 at 3:00 PM., and the Trial scheduled to begin on Monday, February 24, 2020 at 9:00 AM. Said continuance is for good cause and not for purpose of delay.

This continuance is being requested for the following reason to wit:

Counsel for Defendant in cooperation with the United States District Attorney Peter E. Daly, are engaged in negotiations which may result in resolution of this matter without a trial. The parties require additional time to consummate an agreement pursuant to Rule 11 of the Federal Rules of Criminal Procedure. Assistant U.S. Attorney has no objection to the continuance in an effort to provide an opportunity to reach an agreement that will be in the interest of justice.

Counsel feels that the continuance is needed to provide effective representation of their clients.

Wherefore, Counsel for defendant LeTroy Vaughn requests this Honorable Court to grant a continuance and reschedule this matter for Monday, February 24, 2020 or Tuesday, February 25, 2020 9:00AM or 11:30 AM, Attorney Amendolara is previously

scheduled on Tuesday, February 25, 2020 at 10:00 AM before Judge Donald C. Nugent therefore allowing time for his scheduled hearing.

WHEREFORE, Attorney Samuel G. Amendolara, request that this Honorable Court grant this motion and continue the dates set for discovery completion, pretrial motions, final pretrial and trial.

Respectfully submitted,
/s/ Samuel G. Amendolara
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CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operations of the Court electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular US mail. Parties may access this filing through the Court's system.

/s/ Samuel G. Amendolara
SAMUEL G. AMENDOLARA, #0009316
Attorney for Defendant Letroy Vaughn